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October 2, 2018

The Honorable Pamela K. Chen
United States District Judge
U.S. District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States v. José Maria Marin and Juan Ángel Napout*, 15-cr-252 (PKC)

Dear Judge Chen:

We write on behalf of the Fédération Internationale de Football Association ("FIFA") in connection with FIFA's requests for restitution from Defendants José Maria Marin and Juan Ángel Napout.

On September 30, 2018, the Confederation of North, Central American and Caribbean Association Football ("CONCACAF") wrote to the Court (ECF Dkt. No. 1036) to request "that the Court permit it to deliver [billing] records directly to chambers and, consistent with that, direct the parties and their counsel to treat them as sealed records, including by not disseminating them outside of court or introducing them into the court record without prior permission of the Court." Also on September 30, 2018, the Confederación Sudamericana de Fútbol ("CONMEBOL") wrote to the Court (ECF Dkt. No. 1037) to request "that the Court allow CONMEBOL to submit invoices evidencing the legal fees included in its restitution request . . . within a reasonable time period after the Court has ruled on the question of precisely which fees are recoverable."

On October 1, 2018, the Court granted CONCACAF's and CONMEBOL's requests. The Court held (1) that CONCACAF and CONMEBOL would be permitted to file billing records and other documentation supporting their requests for attorneys' fees and costs under seal; and (2) that CONMEBOL would be allowed to submit such billing records after the October 4, 2018 hearing. In connection with the latter holding, the Court noted that "it would be beneficial to the parties and the Court to limit the record disclosure to those categories that the Court has approved."

We write to request that FIFA also be allowed to (1) file billing records and/or other documentation supporting its request for attorney fees and costs under seal; and (2) file such

supporting documentation after the October 4, 2018 hearing, after the Court has provided guidance as to the type and general scope of fees and costs that may be recoverable by the victims. Such a ruling would allow FIFA to submit a narrowly tailored collection of supporting documentation that would minimize the burden on all parties and the Court. FIFA stands ready to submit such billing records in accordance with any deadline the Court sets at the October 4, 2018 hearing.

Very truly yours,
Quinn Emanuel Urquhart & Sullivan LLP

A handwritten signature in blue ink, appearing to be a stylized 'W' followed by a long horizontal stroke.

William A. Burck
Thomas Werlen
Stephen M. Hauss

Attorneys for Fédération Internationale de Football Association

CC: All counsel of record (via ECF)